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KIRBY CORPORATION

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AR/OK/TX BRANCH

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Mark R. Buese
Senior Vice President

November 21, 2003

Ms. Janice Bivens
Enforcement Officer
Superfund Cost Recovery Section (6SF-AC)
United States EPA, Region 6
1445 Ross Avenue
Dallas, TX 75202-2733

Re: Gulfco Marine Maintenance, Inc.

Dear Ms. Bivens:

This responds to your letters of November 20, 2003 to Dixie Carriers, Inc.; Dixie Linehaul and TPT Transportation regarding the referenced. Dixie Carriers, Inc. is the predecessor to our subsidiary Kirby Inland Marine, LP. Dixie Linehaul is not and never was a legal entity, but was a division of Dixie Carriers, Inc. commencing in 1993. TPT Transportation Company was a subsidiary of Dixie Carriers, Inc. formed in 1993 and merged into Kirby Inland Marine Inc. of Louisiana in 1998 which subsequently merged into Kirby Inland Marine LP in 2000. Accordingly, the only entity of the three which existed during the 1970-1979 time frame referenced in your letter was Kirby Inland Marine, LP (formerly Dixie Carriers, Inc.).

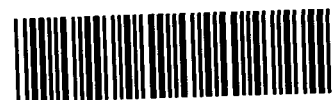
Based on your letter, Gulfco Marine Maintenance, Inc. was a barge cleaning and maintenance facility which used a surface impoundment for wash water from 1970-1979. The surface impoundment was closed and capped pursuant to RCRA in 1982.

While Kirby Inland Marine, LP (formerly Dixie Carriers, Inc.) operated tank barges during the 1970-1979 time frame, neither of the other entities existed then. Further, Dixie Carriers, Inc. tank barges were generally in crude oil service during the referenced time frame and it is unlikely they would have required cleaning, especially in the Freeport, TX area. It is unlikely we will have any invoices or maintenance records related to the 1970-1979 time frame. If you could provide us a copy of the records you maintain associating us with the site, we can respond accordingly.

Regards,

Mark R. Buese

MRB/djj



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